





"The public benefits of the Commission's proposal are clear. First the Commission's proposed allocation will make available several hundred of new channels for land mobile radio operators using narrowband technology. These channels will relieve the congestion within bands currently allocated to the Land Mobile Services - a condition that is worsening as demand increases."

"Second, the development of an extensive Land Mobile system such as the one which UPS contemplates will inevitably lead to innovations and improvements in narrow-band radio technology and to a reduction in the cost of narrowband radio equipment."

"Currently, narrowband technology is used almost exclusively to exploit the space between existing wide band Land Mobile radio channels in the 150 MHz band. This limited amount of spectrum has been inadequate to stimulate the use and development of narrow band radio. The availability of 220-222 MHz will provide a much needed testing ground for narrowband technology and the development of cost effective equipment. Ultimately, refinements in narrowband systems will allow a more efficient use of scarce spectrum increasing the capacity of a given band by as much as five times over current channelization."

"To enhance the ability to develop quickly the equipment necessary to utilize the 220-222 MHz band, UPS has contracted with SEA, Inc., for rights to the latter's advanced narrowband technology and has begun to staff a UPS subsidiary (II Morrow, Inc.) to insure the production of such equipment for UPS's planned system."

"The comments and oppositions to the Commission's proposal essentially make two arguments. (1.) Amateur radio operators need the spectrum to perform several essential functions (repeater stations, repeater station control, and packet radio) and (2.) the proposed reallocation would lead to undue interference to VHF television stations. Neither of these concerns, however, form a basis for rejection of the Commission proposal."

"The amateur radio community already has a generous allotment of spectrum that more than adequately permits it to carry out its operation. Moreover, the few amateur stations currently operating in the 220-222 MHz band can be located elsewhere with minimum disruption."

"Finally, the concern that use of the 220-222 MHz by Land Mobile operators might lead to interference with VHF television stations is not well founded or documented by the parties. The closest VHF channel is separated by a full four megahertz from 220 MHz. In fact, the proposed separation between the VHF channels and the new allocation will insure that if interference could occur, it would be remedied by appropriate operating safeguards."

"Based upon the many public benefits which will result from the proposed

reallocation and the absence of countervailing arguments, UPS strongly urges the Commission to reaffirm its tentative conclusions and allocate the 220-222 MHz band for Private Land Mobile Services using narrowband technology."

The big question is whether the FCC will accept the comments since they were filed six months late. An FCC official told us that such comments are usually rejected or accepted in the Final Order. "Chances are good that it will be accepted."

Ordinarily late filed comments are not accepted, but UPS is just not another commenter. They are a very big company ...and considered very important to America.

On February 18, the ARRL issued League Bulletin No. 18 and went on record that it would strongly oppose acceptance of the UPS comments.

#### o Amateur Industry Meeting in Miami

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ARRL Executive Vice President Dave Sumner, K1ZZ, distributed an eleven page typewritten report to members of industry at the last amateur industry meeting held in Miami a couple of weeks ago. Highlights of the report:

Docket 87-14: ARRL continues to fight FCC's proposed reallocation of 220-222 MHz to Land Mobile. ARRL and several thousand amateurs filed extensive comments. Dozens of Congressmen have written the FCC expressing support of the amateur position. "Empty (Commissioner) chairs" at the FCC and Private Radio Bureau personnel changes could affect the FCC's handling of this docket. The matter will probably come before the FCC in the second quarter.

Archie Comic Books: First printing (100,000) was shipped with 745 youngsters signing up for the Archie Radio Club as of November. A second printing (with 37,687 distributed) has resulted in 560 more members. Questionnaire sent to Archie Club members: 94% thought comic was helpful, 96% wanted to become hams, 77% working on a license...and 22 had actually become amateur radio operators.

New World of Amateur Radio Video: League ordered 1,300 with 444 copies on loan to clubs and instructors, 146 went to teachers, 96 copies given away (21 to National Geographic) ...75 to ARRL Section Managers. Ten one-inch video tapes went to Public/Educational Broadcasters. With only 285 copies actually sold, League would like amateur radio dealers to "embrace the program." Lots of copies are in circulation with duplication actively encouraged. "It has been fed via C-band satellite at least twice, once with Tony England and myself co-hosting..." Feedback has been very positive, criticisms rare...although some would like a shorter version.

Novice Enhancement: "...the numbers of Novices have not been discouraging, as

some have suggested, and are running about 40% ahead of two years ago. ...The main idea was to improve the Novice privileges to help turn inactive license holders (present and future) into active hams. The verdict is in: Novice Enhancement has definitely activated the 10-meter band between 28.3 and 28.5 MHz, and upgrading figures are up. Even so, we need more publicity about Novices now having meaningful privileges and about how to give Novice exams.

League Strength: ARRL membership stands at about 150,000 "...up more than 6,000 in a year. Sometime this year we will surpass our all-time high (in the CB boom) and go on to about 161,000 members by year's end."

ARRL Novice Survey: 4,000 Novices were surveyed at random in December with 426 questionnaires (10.7%) returned so far. ...26% are League members, 88% homeowners, 51% have personal computers, 2/3rds don't have - or don't know they have - a local radio store. Largest occupational group is "retired", 1/3 never get active, another 1/3 get active the first year and then lose interest, 33% perceive the cost of equipment to be inhibiting. ("While this is not a new subject, is it possible for one or more manufacturers to look seriously at offering some low-cost equipment, perhaps an SSB transceiver, for the 10-meter band in the vicinity of \$150?")...

Retirees and Empty Nesters: A pilot recruitment project will be established in the Tampa/St. Petersburg area. More info to follow.

VANS: An ARRL survey of ham radio equipped USA touring vans suitable for amateur radio demonstration/recruitment indicates that the vans are widely available. Sumner suggested that the need was really for a program to develop a presentation package and van deployment plan.

"Operating an Amateur Radio Station": This 40-page ARRL booklet, discontinued a few years ago, may be replaced as an inexpensive hand-out designed to tell first-year hams what they need to know to get on the air and to become otherwise active in Amateur Radio. Sumner asked if there was industry interest in suggesting content, assisting with cost and distribution ...and actually doing some of the distribution "...such as making copies available at retail outlets or inserting them in shipments of equipment to Novices."

On the other hand, it was also reported to us by other members of industry that the ARRL did agree that the "numbers" were really "not there" to report that Novice Enhancement was a success.

The ARRL's Executive Committee (who also serve on the Board of Directors) have agreed to meet with amateur industry spokesperson, Evelyn M. Garrison/KA7LPK of Icom, to hear what the amateur industry encourages the League to do about a "Code Recognition" type of entry level license. Industry got the impression that "by the end of the year", that a less rigid Novice code testing procedure might be supported by the League.

[End this issue]